

REMARKS

Reconsideration of this application is respectfully requested.

Upon entry of the foregoing amendments, claims 13, 21-26, 28-36, 38-41, 43-47, 49-53, 55, 56, 59-60, and 62 are pending in this application, with claims 13, 21, 31, 34, 35, 41, 50, 58, 59, and 60 being the independent claims. Claims 37, 42, 48, 54, 57, and 61 are canceled without prejudice or disclaimer. Based on the above amendments and the following discussion, it is submitted that this application is in condition for allowance.

Allowable Subject Matter

The Office Action, on page 7, in sections 9 and 10, indicate that claims 54, 57-59, and 61 are objected to as being dependent upon a rejected based claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Further, the Office Action indicates that claim 60 would be allowable if rewritten to overcome the rejection under 35 U.S.C. §112, second paragraph, as discussed below, and to include all of the limitations of the base claim and any intervening claims.

Applicants thank the Examiner for the indication of allowable subject matter. Applicants have rewritten the allowable claims in independent form to include the limitations of the base claim and any intervening claims. Specifically, independent claim 21 has been rewritten to include the allowable subject matter of claim 54; independent claim 35 has been rewritten to include the allowable subject matter of claim 57; claim 41 has been rewritten to include the subject matter of claim 48 and the allowable subject matter of claim 61; allowable claim 58 has been rewritten in independent form to include the limitations of base independent claim 35 and

intervening claim 37; and allowable claims 59 and 60 have both been rewritten to include the subject matter of base independent claim 41 and intervening claim 42.

Further, Applicants have rewritten the remaining independent claims to include allowable subject matter. Specifically, independent claims 13 and 31 have been rewritten to include the subject matter of claim 42 and allowable claim 59; independent claim 34 has been rewritten to include to subject matter of claim 37 and allowable claim 58; and independent claim 50 has been rewritten to include to subject matter of claim 42 and allowable claim 60.

In view of the above, Applicants respectfully submit that all claims include allowable subject matter, and the allowance of all claims is respectfully requested.

Objections to the Claims

The Office Action on pages 2-3, in sections 1-4, objects to numerous claims because specific features are not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s) at the time the application was filed, had possession of the claimed invention. Applicants respectfully traverse these objections.

An applicant shows possession of the claimed invention by describing the claimed invention with all of its limitations using such descriptive means as words, structures, figures, diagrams, and formulas that fully set forth the claimed invention. M.P.E.P. § 2163(I), citing, Lockwood v. American Airlines, Inc., 107 F.3d 1565, 1572 (Fed. Cir. 1997). Possession may be shown in a variety in a variety of ways including description of an actual reduction to practice, or by showing that the invention was "ready for patenting" such as by the disclosure of drawings or structural chemical drawings that show that the invention was complete, or by describing distinguishing identifying characteristics sufficient to show that the applicant was in possession

of the claimed invention. M.P.E.P. § 2163(I), citing Pfaff v. Wells Elecs., Inc., 525 U.S. 55, 68 (1998); Regents of the University of California v. Eli Lilly, 119 F.3d 1559, 1568; Amgen, Inc. v. Chugai Pharmaceutical, 927 F.2d 1016, 1021 (Fed. Cir. 1991).

Specifically, the Office Action, on page 2, in section 1, objects to claims 13, 21-26, and 28-62 because the phrase “**single** shared memory” is objected to. It is initially noted that “single shared memory” is not recited in claims 35, 36, 38-40, and 58. Nonetheless, in the present application, a single shared memory is shown, for example, in Figure 6, as a single shared memory 40, and is discussed, for example, on page 10, lines 22-24.

The Office Action, on page 2, in section 2, objects to claims 13, 21, 31, 34, 35, 41, and 50 because the phrase “storing the TDM data in a single memory **based on a time slot of a frame**” is objected to. It is initially noted that “storing the TDM data in a single memory **based on a time slot of a frame**” is not recited in claims 21, 35, and 58. Further, claim 41 recites “said single shared memory to store TDM data received at said input ports based on said time slot of said frame of each TDM data,” and claim 50 recites “storing received TDM data in said single shared memory based on a time slot of a frame of each TDM data.” Nonetheless, in the present application, “storing the TDM data in a single memory **based on a time slot of a frame**” is discussed, for example, on: page 8, lines 18-24; Figure 6, TSI control function 43; page 10, lines 9-21; page 11, lines 4-13; and claim 7, as originally filed.

The Office Action, on page 2, in section 3, objects to claims 21, 35, and 41 because the phrase “a time slot interchange controller coupled to said single shared memory to **select addresses** in said single shared memory **to store TDM data**, said time slot interchange controller to **select an address of said single shared memory** for a TDM data **based on a time slot of a frame**” is objected to. The objected to recitation is discussed, for example, on: page 8,

lines 18-24; Figure 6, TSI control function 43; page 10, lines 9-21; page 11, lines 4-13; and claim 7, as originally filed.

The Office Action, on pages 2-3, in section 4, objects to claims 54, 57, and 61 because the phrase "said time slot interchange controller selects a same address for single shared memory" is objected to. Claims 54, 57, and 61 have been cancelled, and the subject matter for these claims is incorporated in claims 21, 35, and 41, respectively. In the present application, support for the phrase "said time slot interchange controller selects a same address for single shared memory" may be found, for example, on: page 8, lines 18-24; Figure 6, TSI control function 43; page 10, lines 9-21; page 11, lines 4-13; and claim 7, as originally filed.

Accordingly, Applicants respectfully request that the objections be withdrawn.

Rejection of the Claims

The Office Action on page 3, in sections 5 and 6 rejects claim 60 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office Action asserts that the phrase "said TDM memory portion accommodates NxM TDM data" is not described in the specification in such a way as to reasonably convey to one skilled in the art that the inventor had possession of the invention. Applicants respectfully traverse this rejection. Support for the phrase "said TDM memory portion accommodates NxM TDM data" may be found, for example, on page 11, lines 1-3.

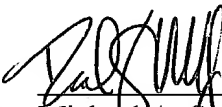

The Office Action on pages 3-6, in sections 7-8, rejects claims 13, 21-26, and 28-53 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,575,844 to Kosuge et al. The rejected claims have either been canceled or amended to recite allowable subject matter, thus

making this rejection moot with respect to claims 13, 21-26, 28-53. Accordingly, Applicants respectfully request that this rejection be withdrawn.

THEREFORE, because all objections and rejections have been overcome, it is submitted that claims 13, 21-26, 28-36, 38-41, 43-47, 49-53, 55, 56, 59-60, and 62 are allowable, and such allowance is requested.

Date: 11/29/2009

Respectfully submitted,

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